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December 23, 1996

**VIA HAND DELIVERY**

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
Room 222  
1919 M Street, N.W.  
Washington, D.C. 20554

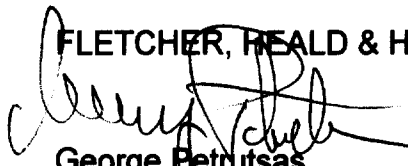
Re: Advanced Television Systems  
and Their Impact Upon the Existing  
Television Broadcast Service  
MM Docket 87-268

Dear Mr. Caton:

On behalf of Lans Service Corporation, I am filing an original and fourteen (14) copies of its Reply Comments in the above-referenced proceeding.

Please communicate with us if additional information is required.

Very truly yours,

  
FLETCHER, HEALD & HILDRETH, P.L.C.  
George Petrutsas  
Counsel for Lans Service Corporation

GP:cej  
Enclosures

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Trade Center, the Chrysler Building, the Pan Am Building, and other tall Manhattan structures. These radio facilities are heavily used to dispatch hundreds of taxicabs, limousines, and other commercial passenger vehicles. Lans Service has invested millions in its communications system and a substantial segment of the taxicab and livery industry in New York relies on that communications system. Therefore, the facilities involved are important, and serve an important transportation industry in the New York City and vicinity.

In its Sixth Further Notice, the Commission established as desirable minimum separations between land mobile systems and DTV assignments, 155 miles for co-channel and 110 miles for adjacent channels. Presumably, these minimum separations assume average terrain. The distance between New Haven and New York City, center to center, is 111 km, or less than 70 miles, over 40 miles less than the desirable minimum. Moreover, there is practically unobstructed line of site between Manhattan's tall buildings and New Haven and that line of site is over water, the Long Island Sound. Further, land mobile stations may be authorized to operate as far as 50 miles from the city center so that, potentially land mobile base stations can be as close as 20 miles to New Haven city center. Mobile stations may operate up to 30 miles from their associated base stations so that mobile units could actually operate in New Haven itself. The interference potential is thus obvious. The interference problem will be serious even with respect to land mobile stations operating on Channel 15 frequencies within New York City. Interference with those systems is expected because of the unobstructed line of site between the tall building in Manhattan and New Haven over

the Long Island Sound.

Therefore, the proposal to allocate Channel 16 to New Haven is flawed<sup>1</sup> and should not be adopted. If the Commission, nevertheless, decides to adopt this proposal, the allocation should be footnoted with information about the interference potential and should be conditioned so that land mobile operations on Channel 15 frequencies in the New York City area would be protected from interference from any DTV stations on Channel 16 in the New Haven market.

Respectfully submitted,

LANS SERVICE CORPORATION

By:   
George Petrutsas

Its Attorney

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Dated: December 23, 1996

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<sup>1</sup>The proposal has other problems. It is inconsistent with the Commission's recent decision to authorize police departments in the New York City area to operate land mobile facilities on frequencies within Channel 16 itself, it violates the minimum TV to TV separation requirements with respect to TV Channel 15 proposed for Providence, R.I., and it is "short-spaced" with co-channel land mobile operations in Boston.